

Juan Torres  
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San Juan PR 00924  
j.torres@bigserver.us

**FILED**  
MAR -4 2024  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION

CASE 13-MD-2420 YGR-DMR

MOTION TO COMPEL COMPLIANCE

I ask this court to compel compliance with Entry 2787 oral approval of the following: The Indirect Purchaser Plaintiffs proposed that Claims Administrators could conduct additional outreach to claimants meeting the following criteria: (i) the claimants were previously sent "last chance" email outreach; (ii) they subsequently requested that the Claims Administrators redirect their digital payments to alternative email addresses (whether or not they made such requests by the stated deadline); and (iii) the alternative email addresses they provided were deemed "undeliverable." Indirect Purchaser Plaintiffs proposed that, to the extent this supplemental outreach yields additional verified email addresses for such claimants, those individuals shall receive the payment they would have received during the first distribution as well as a pro rata share of the second distribution.

The Court approved the proposal.

CHRIS WHIPPS d/b/a DIGITALPAY/SIPREE INC has announced on February 28, 2024, that he is refusing to comply with this procedure and not going to pay me even though I gave the alternative email.

My original email to them was October 13, 2023, I said, "My name is Juan Torres and my payment is pending. I'd appreciate if you can send shortly."

Chris Whipps wrote on the same day, "We confirm the payment email was sent to you but it was not claimed. We are unfortunately no longer able to reissue this request."

Chris Whipps wrote on October 30, 2023, "The Court has allowed a short extension for initial the initial payment distribution. To that end if you provide an

updated email address to resend the payment email or mailing address to resend payment by check by no later than Friday, November 3, 2023 we will update your record to attempt to resend the payment. Please note that if you do not provide your updated contact information by November 3 we will no longer be able to reissue your payment."

On November 2, 2023, I wrote, "Please proceed and direct the payment to j\_t@exploremyspace.com."

On November 2, 2023, Mr. Whipps stated, "We will resend the payment notification to the provided email address, however, please note that this process can take several weeks."

On February 27, 2024, I wrote, "I never received the promised payment email either to this email address or to the alternative email address that I provided. It is my understanding of the document recently filed into this case by Mr. Chris Whipps correct that digital payments that did not go through will once again be attempted? There is no reason that either address should have not received the email. I have no junk mail or spam filter on either of these two email addresses."

On February 28, 2024, Mr. Whipps wrote, "We confirm that the payment email was sent to you but it was not claimed. **We are unfortunately no longer able to reissue this payment.**"

I think I fall into the clear definition of someone who provided the secondary email address and did not receive the second payment. It's exactly what he promised to pay, and here he is refusing to pay as if I am supposed to just overlook this.

His documents filed with the Court are so vague and this is going to continue with every one of these mass tort cases that he is involved in.

This Court needs to create a formal order requiring him to pay because he obviously doesn't understand what he proposed.



Juan Torres

Subject **RE: FW: Payment is pending**  
From info@reversethecharge.com <info@reversethecharge.com>  
To 'j.torres@bigserver.us' <j.torres@bigserver.us>  
Date 2024-02-28 11:07



We confirm that the payment email was sent to you but it was not claimed. We are unfortunately no longer able to reissue this payment.

Sincerely,  
Lithium Batteries Indirect Purchaser Settlement Administrator (MJG)  
1-855-730-8645  
[info@reversethecharge.com](mailto:info@reversethecharge.com)

-----Original Message-----

From: [j.torres@bigserver.us](mailto:j.torres@bigserver.us) <[j.torres@bigserver.us](mailto:j.torres@bigserver.us)>  
Sent: Tuesday, February 27, 2024 9:47 AM  
To: [info@reversethecharge.com](mailto:info@reversethecharge.com)  
Subject: Re: FW: Payment is pending

CAUTION: This email originated from outside of Epiq. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report phishing by using the "Phish Alert Report" button above.

I never received the promised payment email either to this email address or to the alternate email address that I provided ([j\\_t@exploremyspace.com](mailto:j_t@exploremyspace.com))

Is my understanding of the document recently filed into the case by Mr. Chris Whipps correct that digital payments that did not go through will once again be attempted?

There is no reason that either address should have not received the email. I have no junk mail or spam filter on either of these two email addresses.

Juan Torres

On 2023-11-02 10:36, [info@reversethecharge.com](mailto:info@reversethecharge.com) wrote:

We will resend the payment notification to the provided email address, however, please note that this process can take several weeks.

Here is a list of valid domains you will encounter when receiving a digital payment. Should you choose to unsubscribe or report this email as spam, you will become ineligible to receive a digital distribution payment.

- \* Pre-payment notices for digital payments will be sent from:  
[payments@mail.reversethechargepayments.com](mailto:payments@mail.reversethechargepayments.com)
- \* Payment notifications will be sent from:  
[payments@mail.reversethechargepayments.com](mailto:payments@mail.reversethechargepayments.com)
- \* Payment options accessed through the payment email will direct to:  
[payments@reversethechargepayments.com](mailto:payments@reversethechargepayments.com)

\* Retail eGiftcards (like Target, Starbucks, Amazon, etc.) and Digital Mastercards will be delivered from:  
[lithiumbatterySettlement@hawkmarketplace.com](mailto:lithiumbatterySettlement@hawkmarketplace.com)

Please note that the above emails are unmonitored and are for sending payments only.

Sincerely,  
Lithium Batteries Indirect Purchaser Settlement Administrator (MJG)  
1-855-730-8645  
[info@reversethecharge.com](mailto:info@reversethecharge.com)

-----Original Message-----

From: [j.torres@bigserver.us](mailto:j.torres@bigserver.us) <[j.torres@bigserver.us](mailto:j.torres@bigserver.us)>  
Sent: Thursday, November 2, 2023 7:15 AM  
To: [info@reversethecharge.com](mailto:info@reversethecharge.com)  
Subject: Re: FW: Payment is pending

CAUTION: This email originated from outside of Epiq. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report phishing by using the "Phish Alert Report" button above.

Please proceed and direct the payment to [j\\_t@exploremyspace.com](mailto:j_t@exploremyspace.com)

Juan Torres

On 2023-10-30 14:01, [info@reversethecharge.com](mailto:info@reversethecharge.com) wrote:

The Court has allowed a short extension for initial the initial payment distribution. To that end, if you provide an updated email address to resend the payment email or mailing address to resend the payment by check by no later than Friday, November 3, 2023 we will update your record to attempt to resend the payment.

Please note that if you do not provide your updated contact information by November 3 we will no longer be able to reissue your payment.

Sincerely,  
Lithium Batteries Indirect Purchaser Settlement Administrator (DEF)  
1-855-730-8645  
[info@reversethecharge.com](mailto:info@reversethecharge.com)

-----Original Message-----

From: [info@reversethecharge.com](mailto:info@reversethecharge.com)  
Sent: Friday, October 13, 2023 4:15 PM  
To: '[j.torres@bigserver.us](mailto:j.torres@bigserver.us)' <[j.torres@bigserver.us](mailto:j.torres@bigserver.us)>  
Subject: RE: Payment is pending

We confirm that the payment email was sent to you but it was not

claimed. We are unfortunately no longer able to reissue this payment.

Sincerely,

Lithium Batteries Indirect Purchaser Settlement Administrator (MJG)

1-855-730-8645

[info@reversethecharge.com](mailto:info@reversethecharge.com)

-----Original Message-----

From: [j.torres@bigserver.us](mailto:j.torres@bigserver.us) <[j.torres@bigserver.us](mailto:j.torres@bigserver.us)>

Sent: Friday, October 13, 2023 6:06 AM

To: [info@reversethecharge.com](mailto:info@reversethecharge.com)

Subject: Payment is pending

CAUTION: This email originated from outside of Epiq. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report phishing by using the "Phish Alert Report" button above.

Hi!

My name is Juan Torres and my payment is pending. I'd appreciate if you can send shortly.

Thanks a lot,

Juan Torres

[j\\_t@exploremyspace.com](mailto:j_t@exploremyspace.com)

JEP

817 CC Lt

30 PR 00921

FF 1906D

Handwritten signature/initials

**RECEIVED**

MAR 04 2024

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

94102-34899

SAN JUAN PR 009

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SANCOCHO



CLERK U.S. District Ct.  
450 Golden Gate Ave BX 36060  
SAN FRANCISCO CA

94102-3489



